



Information provided pursuant to Article 13 of European Regulation 679/2016 (GDPR - General Data Protection Regulation) relating to the following data processing – execution of the service contract

Introduction

TrustPro Ltd considers it of priority importance to respect the rights of the interested party and the lawful and correct use of his personal data. The company has implemented the indications of the European Regulation, giving centrality to the indications of the Privacy Guarantor and conducting its treatments according to principles of transparency and compliance. With the EU Regulation 679/2016 TrustProLtd, based in Dublin, email info@trustpro.eu is required to provide some information regarding the use of personal data.

This information indicates to the interested party who and how he will process his data, the possible mandatory provision for the provision of information or products / services, to whom to contact to obtain clarifications or to exercise the rights provided for by the current data protection regulations.

Source and type of data processed

The personal data acquired by the Data Controller may be collected:

- directly with the interested party in relation to the contractual obligations stipulated, for the execution of the services recorded in the contract and to meet legislative, contributory, tax and accounting obligations, in telematic or manual mode.

These data are processed in compliance with data protection legislation, according to principles of transparency and lawfulness.

Purpose of data processing

The data are processed within the normal activity of the organization and according to specific purposes detailed in the following table. If the data controller intends to further process the personal data for a purpose other than that for which they were collected, he will provide the interested party with any necessary information in advance and will request his consent again where provided.

The purposes for which the data are collected are as follows:

- execution of contractual obligations

Type of data and purpose	Retention period
Name, surname, tax code, date and place of birth, residence, details of the identity document,	The data will be kept for 20 years to comply with legislative obligations regarding the conservation of data relating to remote digital signature services

video registration for execution of the service contract	
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Provision of data and consequences of failure to provide it

The provision of data must be considered mandatory with regard to the processing that TrustPro ltd must carry out to fulfill its obligations towards the interested party, on the basis of an existing contract, as well as legal obligations, rules and regulations. Failure to provide such data will make it impossible for the Data Controller to proceed with the provision of the service.

Methods of processing personal data

The processing of personal data takes place using manual and IT tools with logic strictly related to the purposes and in order to guarantee the security and confidentiality of the data. The archiving of the documentation is carried out both electronically and on paper. Some essential information:

- the collection of personal data is limited to the minimum necessary for each specific purpose of the processing;
- the processing of personal data is limited to the purposes for which they were collected;
- the storage of personal data is limited to the minimum necessary for each specific purpose of the processing;
- Profiling and segmentation activities will not be carried out
- For the hosting of the systems necessary for the provision of the service, TrustPro uses a third-party Data Center located in Ireland

Subjects involved in the processing of data

- Employees and collaborators who by task are authorized to process data. In the event that the collaborators carry out activities on the IT systems, as System Administrators, they are appropriately appointed by the data controller.
- By virtue of the processing carried out and the provisions of Article 37 of European Regulation 679/2016, a Personal Data Protection Officer (RDP) has been appointed.

Exercise of the rights of the data subject

At any time the interested party may exercise his rights towards the Data Controller or the Data Processor, pursuant to CHAPTER III, Rights of the Interested Party, articles 12-21 of EU Regulation 679/2016. Requests can be forwarded directly to the Data Controller directly to the DPO by writing to the email info@trustpro.eu.

Below are the rights you can exercise (Section 3 GDPR articles):

- **Art. 15** Right of access by the data subject
- **Art. 16** Right to rectification

- **Art.17** Right to erasure ('right to be forgotten')
- **Art.18** Right to restriction of processing
- **Art.19** Notification obligation regarding rectification or erasure of personal data or restriction of processing
- **Art.20** Right to data portability
- **Art.21** Right to object
- **Art. 22** Automated individual decision-making, including profiling

In the event of a request to exercise the rights indicated above, the Data Controller undertakes to provide feedback within 30 days and, in case of impossibility to respect these times, to justify any extension of the deadlines. The feedback will take place free of charge except in cases of unfoundedness (e.g. if there are no data concerning the requesting data subject) or excessive requests (e.g. repetitive over time) for which a fee may be charged not exceeding the costs actually incurred for the research carried out.

The data subject has the right to lodge a complaint with the Irish Data Protection Authority at the following addresses:

21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland

Phone: **076 110 4800 / 057 868 4800**

<https://forms.dataprotection.ie/contact>

E-mail: dpo@dataprotection.ie



Legal basis of the processing

Pursuant to articles 7 and 13 of European Regulation 679/2016, the Customer declares to have received the information about:

1. the mandatory nature or provision of data
2. the duration and criteria for defining data retention
3. the consequences of a refusal to respond
4. the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as managers or agents, and the scope of dissemination of the data.
5. the rights referred to in art. 15-22 of European Regulation 679/2016
6. the purposes and methods of processing for which the data are intended
7. the identification details of the owner